

DANIEL G. BOGDEN
United States Attorney
District of Nevada
ALEXANDRA MICHAEL
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
(702) 388-5087 (Facsimile)
Alexandra.M.Michael@usdoj.gov
Counsel for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:15-cr-062-JCM-CWH
)	
Plaintiff,)	STIPULATION TO CONTINUE
)	GOVERNMENT'S RESPONSE
vs.)	TO DEFENDANT'S MOTION
)	(Dkt. #179)
LOUIS MATTHEWS,)	
)	
Defendant.)	
)	

STIPULATION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Alexandra Michael, Assistant United States Attorney, counsel for the United States of America, and Craig A. Mueller, Esq., counsel for Defendant LOUIS MATTHEWS, that the date for the Government to file a response to Defendant's "Motion to Declare Mistrial and Grant New Trial" (Docket #179) be extended for two (2) days, until November 23, 2016, or to a date to be set at the Court's convenience.

This stipulation is entered for the following reasons:

1 1. The additional time requested is not sought for the purposes of delay, but to
2 allow counsel sufficient time to complete its response to the issues raised in the Defendant's
3 Motion, taking into account due diligence.

4 2. The Government has conferred with defense counsel and he does not object to
5 the continuance.

6 3. The Defendant is incarcerated, but he does not object to the short continuance.

7 4. Sentencing in this matter is presently set for January 12, 2017. Consequently, the
8 requested extension of the Government's response deadline is not likely to prejudice the
9 Defendant.

10 5. Additionally, denial of this request for continuance could result in a miscarriage
11 of justice.

12 6. This is the second request for a continuance filed herein.

13 Dated: November 21, 2016.

14
15
16 _____/s/
17 ALEXANDRA MICHAEL
18 Assistant United States Attorney
19 Counsel for the United States
20
21
22
23
24
25
26
27
28

_____/s/
CRAIG A. MUELLER, ESQ.
Counsel for Defendant LOUIS MATTHEWS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,) 2:15-cr-062-JCM-CWH
)
Plaintiff,)
)
vs.)
)
LOUIS MATTHEWS,)
)
Defendant.)

FINDINGS OF FACTS

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The additional time requested is not sought for the purposes of delay, but to allow counsel sufficient time to complete its response to the issues raised in the Defendant's Motion, taking into account due diligence.

2. The Government has conferred with defense counsel and he does not object to the continuance.

3. The Defendant is incarcerated, but he does not object to the short continuance.

4. Sentencing in this matter is presently set for January 12, 2017. Consequently, the requested extension of the Government's response deadline is not likely to prejudice the Defendant.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

6. This is the second request for a continuance filed herein.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the motion response deadline.

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, **IT IS HEREBY ORDERED**, that Government's Response to Defendant's "Motion to Declare Mistrial and Grant New Trial" is extended until November 23, 2016
DATED November 21, 2016.


UNITED STATES DISTRICT JUDGE